

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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JOEL S. ARIO, ACTING INSURANCE
COMMISSIONER OF THE COMMONWEALTH
OF PENNSYLVANIA, IN HIS CAPACITY AS
LIQUIDATOR OF RELIANCE INSURANCE
COMPANY, on behalf of herself and all others
similarly situated,

07 CV 6486 (PAC)

**MOTION TO ADMIT COUNSEL
PRO HAC VICE**

Plaintiff,

v.

AXIUM INTERNATIONAL, INC. d/b/a AXIUM
ENTERTAINMENT INC.,

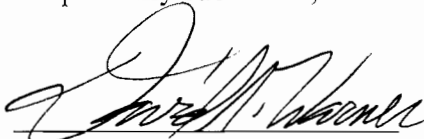
Defendant.
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TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

Pursuant to Rule 1.3(c) of the Local Rules of the United States District Courts of the Southern and Eastern Districts of New York, I, David S. Warner, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission *pro hac vice* of Ronald A. Peters, Esq., of Littler Mendelson, P.C., 50 West San Fernando Street, 14th Floor, San Jose, California 95113, Telephone: (408) 998-4150, Fax: (408) 288-5686, Email: rpeters@littler.com, as counsel for Defendant Axium International, Inc. in the above-captioned action. Mr. Peters is a member in good standing of the Bar of the States of California and Washington. There are no pending disciplinary proceedings against him in any State or Federal court.

Respectfully submitted,

Dated: August 30, 2007
New York, New York



David S. Warner (DW-4576)
LITTLER MENDELSON, P.C.
885 Third Avenue—16th Floor
New York, New York 10022
Telephone: 212.583.9600
Facsimile: 212.832.2719
Attorneys for Defendant Axium International, Inc.

FILED
U.S. DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
2007 AUG 30 PM 4:14
J. J. [illegible]

2007 AUG 30 PM 4:14

625-876
17-K-578

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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JOEL S. ARIO, ACTING INSURANCE
COMMISSIONER OF THE COMMONWEALTH
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COMPANY, on behalf of herself and all others
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AXIUM INTERNATIONAL, INC. d/b/a AXIUM
ENTERTAINMENT INC.,

Defendant.

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07 CV 6486 (PAC)

**DECLARATION OF DAVID S.
WARNER IN SUPPORT OF
MOTION TO ADMIT COUNSEL
PRO HAC VICE**

I, David S. Warner, hereby declare and state in accordance with 28 U.S.C. § 1746:

1. I am a shareholder of the law firm of Littler Mendelson, P.C., attorneys of record for Defendant Axiom International, Inc. ("Defendant") in the above-captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Defendant's motion to admit Ronald A. Peters, Esq., as counsel *pro hac vice* to represent Defendant in this matter.

2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law here in September 2001. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

3. I have known Ronald A. Peters, Esq., since 1999.

4. Mr. Peters is a fellow shareholder of my firm, Littler Mendelson, P.C., in San Jose, California.

5. Attached hereto as Exhibits A and B are Certificates of Good Standing applicable to Mr. Peters from the State Bar of California and the Supreme Court of the State of Washington, respectively. Both of these certificates were issued within the last thirty (30) days.

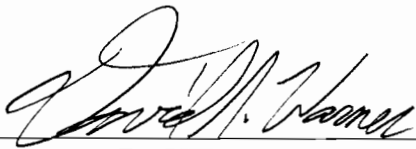
6. I have found Mr. Peters to be a skilled attorney and a person of integrity. He is experience in Federal practice and is familiar with the Federal Rules of Civil Procedure.

7. Accordingly, I am pleased to move for the admission of Ronald A. Peters, Esq., *pro hac vice*.

8. I respectfully submit a proposed order granting the admission of Ronald A. Peters, Esq., *pro hac vice*, which is attached hereto as Exhibit C.

WHEREFORE, it is respectfully requested that the motion to admit Ronald A. Peters, Esq., *pro hac vice*, to represent Defendant in the above-captioned matter, be granted.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 30th day of August 2007 in New York, New York.



DAVID S. WARNER



THE
STATE BAR
OF CALIFORNIA

180 HOWARD STREET
SAN FRANCISCO, CALIFORNIA 94105-1639
TELEPHONE (415) 538-2000

August 21, 2007

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, RONALD ALLEN PETERS, #169895 was admitted to the practice of law in this state by the Supreme Court of California on February 25, 1994; and has been since that date, and is at date hereof, an ACTIVE member of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Governors or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

A handwritten signature in cursive script, appearing to read "Kath Lambert".

Kath Lambert
Custodian of Membership Records

IN THE SUPREME COURT OF THE STATE OF WASHINGTON

IN THE MATTER OF THE ADMISSION

BAR # 31627

OF

CERTIFICATE OF GOOD

RONALD ALLEN PETERS

STANDING

TO PRACTICE IN THE COURTS OF THIS STATE.

I, Ronald R. Carpenter, Clerk of the Supreme Court of the State of Washington, hereby certify

RONALD ALLEN PETERS

was regularly admitted to practice as an Attorney and Counselor at Law in the Supreme Court and all the Courts of the State of Washington, on November 19, 2001, and is now and has been continuously since that date an attorney in good standing in said Court.



IN TESTIMONY WHEREOF, I have
hereunto set my hand and affixed
the seal of said Court this
21st day of August, 2007

A handwritten signature in black ink, appearing to read "Ronald R. Carpenter", is written over a horizontal line.

RONALD R. CARPENTER

SUPREME COURT CLERK

WASHINGTON STATE SUPREME COURT

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JOEL S. ARIO, ACTING INSURANCE
COMMISSIONER OF THE COMMONWEALTH OF
PENNSYLVANIA, IN HIS CAPACITY AS
LIQUIDATOR OF RELIANCE INSURANCE
COMPANY, on behalf of herself and others similarly
situated,

Plaintiff,

-against-

AXIUM INTERNATIONAL, INC. d/b/a AXIUM
ENTERTAINMENT, INC.

Defendants.

07 CV 6486 (PAC)

CERTIFICATE OF SERVICE

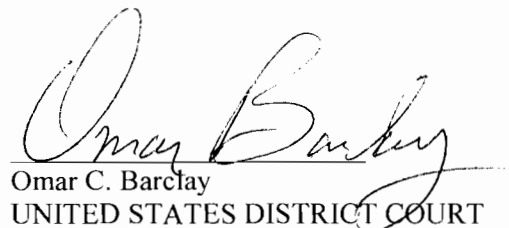
Omar C. Barclay, hereby declares and states:

1. I am not a party to this action, am over the age of eighteen years and reside in Kings County, New York.
2. On August 30, 2007, I served a copy of the annexed Motion to Admit Counsel Pro Hac Vice; Declaration of David S. Warner In Support of Motion to Admit Counsel Pro Hac Vice in the above-captioned action by placing said copy in sealed envelope(s) for mailing via U.S. Postal Service in accordance with my office procedures to the following addressees:

Kenneth G. Roberts (KR-6960)
Jill L. Mandell (JM-3270)
Wolf, Block, Schorr and Solis-Cohen, LLP
250 Park Avenue
New York, NY 10177
212-986-1116

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed: August 30, 2007
New York, New York


Omar C. Barclay
UNITED STATES DISTRICT COURT